

**IN THE U.S. DISTRICT COURT
DISTRICT OF MARYLAND (GREENBELT)**

Elsie-Shanta Sharp

Plaintiff,

v.

Carrie Ward, et al.

Defendants.

Case No. 8:15-cv-00392-GJH

MOTION TO DISMISS

Defendants George Jacob Geesing, Howard Bierman, Carrie Ward, and BWL Law Group, LLC¹ (“Moving Defendants”), by counsel, and pursuant Rules 12(b)(6) and 8(a) of the Federal Rules of Civil Procedure, move to dismiss Plaintiff’s Complaint with prejudice for failure to state a claim upon which relief can be granted.

The reasons for this Motion are more fully set forth in the Motion to Dismiss Plaintiff’s Complaint and Memorandum of Law In Support filed in this case by co-defendants Nationstar Mortgage LLC, Mortgage Electronic Registration Systems, Inc., and Federal National Mortgage Association on October 1, 2015, which is hereby fully adopted and incorporated herein by reference to the extent it seeks dismissal of Plaintiff’s Complaint.

WHEREFORE, Defendants George Jacob Geesing, Howard Bierman, Carrie Ward, and BWL Law Group, LLC respectfully request that this Court grant the instant Motion to Dismiss. Also attached hereto, please find a proposed Order granting this Motion.

¹ Plaintiff’s Complaint names “George Jacob Geesing, Attorney, (etcetera all, or and or assigns), BWL Law Group” as a defendant. It is assumed that the reference to BWL Law Group is a misnomer. To the extent Plaintiff intended to sue BWL Law Group, LLC, this motion should be equally construed as being brought by said party.

Respectfully submitted,

/s/ David Solan, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of October, 2015, a copy of the foregoing Motion to Dismiss was filed electronically with the U.S. District Court and, pursuant to L.R. 102.1.c., the Court's notice of electronic filing constitutes a certificate of service on all other counsel in the action. In addition, the foregoing was served on the following via U.S. mail, postage prepaid:

Elsie-Shanta Sharp
14110 Kydan Court
Brandywine, MD 20613

Christopher Halmy, Chief Financial Officer GMAC Bank, Limited Liability Corporation
GMAC Mortgage Limited Liability Corporation a/k/a Ally Bank
200 Renaissance Center
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Francis Insley, Resident Agent
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135 Spa Drive
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Francis Insley, Resident and
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/s/ David Solan, Esq.
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